

**KAUFMAN DOLOWICH VOLUCK & GONZO LLP**

Joseph Kouri (State Bar No. 133804)

351 California Street, Suite 500

San Francisco, CA 94104

Telephone: (415) 402-0059

Facsimile: (415) 402-0079

email: jkouri@kdvglaw.com

Attorneys for Plaintiff

**PERDANA CAPITAL (LABUAN) INC.**

A Malaysian Corporation

**UNITED STATES DISTRICT COURT**

**NORTHERN DISTRICT OF CALIFORNIA**

PERDANA CAPITAL (LABUAN) INC., a  
Malaysian corporation,

Plaintiff,

vs.

MOHAMMAD AKRAM CHOWDRY, an  
individual; HI-TECH VENTURE  
PARTNERS, LLC, a Delaware Limited  
Liability Company; HI-TECH ASSOCIATES,  
a California Limited Liability Company; and  
DOES 1-50,

Defendants.

Case No.: CV-09-1479 PJH

Assigned to Hon. Phyllis J. Hamilton

**STIPULATION TO CONTINUE  
NOVEMBER 5, 2009 CASE  
MANAGEMENT CONFERENCE AND  
RELATED DATES AND ORDER MODIFYING**

DATE  
Date: November 5, 2009  
Time: 2:30 p.m.  
Dept.: Courtroom 3, 17th Floor

**WHEREAS**, the Case Management Conference in this matter is currently scheduled for November 5, 2009 at 2:30 p.m. in Courtroom 3 of the Northern District of California, pursuant to the Stipulation to Continue September 10, 2009 Case Management Conference and Related Dates, signed by the Court on August 31, 2009;

**WHEREAS**, the current case management schedule requires the Parties to file their Rule 26(f) Report, complete their initial disclosures, and file a Joint Case Management Conference Statement no later than October 29, 2009;

1           **WHEREAS**, pursuant to Local Rule 16-2(d), a party may seek relief from the Case  
2 Management Schedule upon a motion that (1) describes the circumstances which support the  
3 request; (2) affirms that counsel for the moving party has conferred with all other counsel in an  
4 effort to reach agreement about the matter and reports whether the other counsel supports or  
5 opposes the request for relief; (3) is accompanied by a proposed revised case management  
6 schedule; and (4) indicates any changes required in the ADR process or schedule in the case;

7           **WHEREAS**, the Parties have been working cooperatively in efforts they hope may  
8 facilitate resolution of this matter;

9           **WHEREAS**, Plaintiff's counsel is unable to appear at the November 5, 2009 Case  
10 Management Conference, or otherwise comply with the case management schedule because his  
11 cardiologist has scheduled him for an angiogram/angioplasty that morning and it is essential that  
12 he undergoes the procedure at this time.

13           **WHEREAS**, the Parties agree to "meet and confer" no later than November 18, 2009  
14 regarding initial disclosures, early settlement, ADR process selection, and discovery plan;

15           **NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED**, by the  
16 undersigned Parties, as follows:

17           1.       That the hearing date for the Initial Case Management Conference shall be  
18                    Thursday                   3                   2:00  
19 scheduled for ~~Wednesday, December 2, 2009~~, at ~~2:30~~ p.m., in Courtroom 3, 17th Floor of the  
20 Northern District;

21           2.       That the last day for Parties to file the Rule 26(f) Report, complete initial  
22 disclosures or state objection in Rule 26(f) Report, and file their Case Management Statement per  
23 the Court's Standing Order re Contents of Joint Case Management Statement shall be  
24 **Wednesday, November 25, 2009;**

25 ///

26 ///

27 ///

28 ///

**IT IS SO STIPULATED.**

Respectfully submitted,

DATED: November 3 ,2009

KAUFMAN DOLOWICH VOLUCK & GONZO LLP

By: /s/ Joseph Kouri

Joseph Kouri  
Attorneys for Plaintiff  
PERDANA CAPITAL (LABUAN) INC.  
A Malaysian Corporation

Respectfully submitted,

DATED: November 3 ,2009

LAW OFFICES OF MICHAEL Q. EAGAN

By: /s/ Thomas Manulkin

Thomas Manulkin  
Attorneys for Defendants  
MOHAMMAD AKRAM CHOWDRY, HI-TECH  
VENTURE PARTNERS, LLC; and HI-TECH  
ASSOCIATES

I, Joseph Kouri, am the ECF User whose ID and password are being used to file this ADR Certification by Parties and Counsel. In compliance with General Order 45, X.B., I hereby attest that Thomas Manulkin has concurred in this filing.

DATED: November 3, 2009

By: /s/ Joseph Kouri

Joseph Kouri (State Bar No. 133804)  
jkouri@kdvglaw.com

**PURSUANT TO STIPULATION, IT IS SO ORDERED**

DATED: November 4\_, 2009

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

By:

The Honorable Phyllis J. Hamilton

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STIPULATION TO CONTINUE NOVEMBER 5, 2009 CASE MANAGEMENT  
CONFERENCE AND RELATED DATES  
Case No.: CV-09-1479 PJH

*KDVG, LLP*

